

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

REDACTED

UNITED STATES OF AMERICA,

Plaintiff,

v.

YUSEF REYNOLDS,

Defendant.

Criminal Action No. 12- 12

INDICTMENT

The Grand Jury for the District of Delaware charges that:

Count 1

Between on or about December 1, 2011, and on or about January 26, 2012, in the District of Delaware and elsewhere, the defendant, YUSEF REYNOLDS, did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means, in and affecting interstate commerce, "D.R.," a minor, knowing and in reckless disregard of the fact that "D.R." had not attained the age of 18 years and that "D.R." would be caused to engage in a commercial sex act, in violation of Title 18, United States Code, Section 1591(a).

Count 2

Between on or about January 17, 2012, and on or about January 26, 2012, in the District of Delaware and elsewhere, the defendant, YUSEF REYNOLDS, did knowingly transport "D.R.," an individual who had not attained the age of 18 years, in interstate commerce, to wit, between New Jersey and Delaware, with the intent that "D.R." engage in prostitution and in any sexual activity for which any person can be charged with a criminal offense, including, but not

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limited to: (1) Unlawful Sexual Contact Second Degree, in violation of Title 11, Delaware Code, Section 768; and (2) Rape Fourth Degree, in violation of Title 11, Delaware Code, Section 770, All in violation of Title 18, United States Code, Section 2423(a).

Count 3

Between on or about December 1, 2011, and on or about January 26, 2012, in the District of Delaware and elsewhere, the defendant, YUSEF REYNOLDS did, and attempted to, employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct; to wit, digital files depicting "D.R.," a female minor, engaged in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2)(A), which visual depiction was transported in interstate commerce and was produced using materials that had been mailed, shipped, and transported in interstate commerce, in violation of Title 18, United States Code, Section 2251(a).

Count 4

Between on or about January 17, 2012, and on or about January 26, 2012, in the District of Delaware, the defendant, YUSEF REYNOLDS, did knowingly possess any computer disk and any other material that contained images of child pornography that had been mailed and shipped and transported in interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed and shipped and transported in interstate and foreign commerce by any means, including by computer; that is, YUSEF REYNOLDS did knowingly possess computer disks that contained multiple digital files containing visual depictions of a minor engaged in sexually explicit conduct, including but not limited to actual and simulated sexual intercourse, fellatio, cunnilingus, masturbation, and the lascivious

exhibition of the genitals and pubic area, in violation of Title 18, United States Code, Sections 2252A(a)(5)(B), (b)(2), and 2256(8)(A).

Count 5

Between on or about January 17, 2012 and on or about January 26, 2012, in the State and District of Delaware and elsewhere, the defendant, YUSEF REYNOLDS, did knowingly possess a firearm, that is, a Smith & Wesson 9-millimeter, semi-automatic handgun bearing serial number 0904, in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, that is:

1. Sex Trafficking of a Minor, as set forth in Count 1, in violation of Title 18, United States Code, Section 1591(a);

2. Transportation of a Minor with Intent to Engage in Criminal Sexual Activity, as set forth in Count 2, in violation of Title 18, United States Code, Section 2423(a);

3. Production of Child Pornography, as set forth in Count 3, in violation of Title 18, United States Code, Section 2252(a); and

4. Possession of Child Pornography, as set forth in Count 4, in violation of Title 18, United States Code, Section 2252A(a)(5)(B);

All in violation of Title 18, United States Code, Section 924(c)(1)(A).

Forfeiture Count

Upon conviction for violating Title 18, United States Code, Sections 924(c), 1591(a), 2251, 2252A, and 2423(a), as set forth in Counts 1 through 6, the defendant, YUSEF REYNOLDS shall forfeit to the United States any and all matter that contains visual depictions of child pornography or visual depictions that are or appear to be of minors engaged in sexually explicit conduct, that are produced, transported, shipped, received or possessed in violation

thereof; any property constituting or derived from any proceeds YUSEF REYNOLDS obtained directly or indirectly as a result of the aforementioned violations; and any and all property used or intended to be used in any manner or part to commit and to promote the commission of the aforementioned violations, including but not limited to the following:

1. ACER ASPIRE ONE LAPTOP, D257-13450, Serial # 12800300325;
2. VIVITAR VIVICAM F536 Digital Camera with Memory Card;
3. LG Cell Phone, Serial # 105CYRN0597110;
4. SANYO BOOST MOBILE Cell Phone, MODEL SCP6760;
5. VERIZON SAMSUNG Cell Phone, MODEL: SCH-U360, SKU: SCHU360PP;
6. LG VIRGIN MOBILE Cell Phone, MODEL VM101, Serial # 105CYAS50538400;
7. One Pro-blue flashdrive;
8. One Pro-White flashdrive;
9. One Lacia DVD Player;
10. METRO PCS cellular phone, Model M635, Serial # 27H9MB1191909969;
11. Green Dot Visa accounts:
#4255-2200-2428-9660;
#4801-2822-2888-5510;
#4255-2200-2353-9529;
#4255-2200-1292-6026;
#4984-0300-0424-5816;
#4984-0300-0877-3250;
12. Visa Gift Card accounts:
#4358-8026-7676-9028;
#4358-8042-9810-4774;
13. Walmart Visa debit card accounts:
#4470-9133-4064-0934;
#4470-9133-3316-6707;
#4470-9133-3119-1723;


14. Bank of America Visa debit account #4117-7440-2755-3036;
15. \$2,086 in U.S. Currency; and
15. One Smith & Wesson 9-millimeter handgun, Serial # DSL0904 and 15 rounds of 9-millimeter ammunition

pursuant to Title 18, United States Code, Sections 924(d), 1594, 2253 and 2428, and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

Foreperson

CHARLES M. OBERLY, III
UNITED STATES ATTORNEY

By: 

Edward J. McAndrew
Assistant United States Attorney

Dated: February 16, 2012